

EXHIBIT 1

DOLORES Y. LEAL (134176)
OLIVIA FLECHSIG (334880)
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048-5217
(323) 653-6530
dleal@amglaw.com
oflechsig@amglaw.com

Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
)	
Plaintiff,)	PLAINTIFF MARK SNOOKAL'S
)	FIRST SET OF WRITTEN
)	INTERROGATORIES TO
vs.)	DEFENDANT CHEVRON USA.
)	INC.
)	
CHEVRON USA, INC., a California)	[FRCP RULE 33]
Corporation, and DOES 1 through)	
10, inclusive,)	
)	
)	
)	
Defendants.)	
)	
)	

INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all individuals involved in the decision to declare Plaintiff “not fit for duty” for the Reliability Engineering Manager position in Escravos, Nigeria.

INTERROGATORY NO. 2:

IDENTIFY any and all persons who were involved in the hiring decisions for any of the job positions described in Paragraph 29 of the Complaint.

INTERROGATORY NO. 3:

For each person **YOU IDENTIFY** in response to Interrogatory No. 2 above, state their date of birth.

INTERROGATORY NO. 4:

For each job position to which Plaintiff applied (as identified in Paragraph 29 of the Complaint), describe in detail all of the hiring criteria **YOU** used to select each applicant for each position.

INTERROGATORY NO. 5:

For each job position to which Plaintiff applied (as described in Paragraph 29 of the Complaint) **IDENTIFY** each person **YOU** selected for that position.

INTERROGATORY NO. 6:

For each person **YOU IDENTIFY** in response to Interrogatory No. 5 above, state their date of birth.

INTERROGATORY NO. 7:

For each person identified in **YOUR** response to Interrogatory No. 5, describe in detail in what way(s) the person **YOU** selected was allegedly more qualified than Plaintiff.

INTERROGATORY NO. 8:

Describe in detail the reason **YOU** deemed Plaintiff “not fit for duty” for the Reliability Engineering Manager position in Escravos, Nigeria.

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On **May 7, 2024** I served the foregoing document described as **PLAINTIFF MARK SNOOKAL'S FIRST SET OF WRITTEN INTERROGATORIES TO DEFENDANT CHEVRON USA, INC** on interested parties in this action:

Tracey A. Kennedy, Esq.
Robert E. Mussig, Esq.
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071-1422
Tel: (213) 620-1780
e-mail: tkennedy@sheppardmullin.com
e-mail: rmussig@sheppardmullin.com

Linda Z. Shen, Esq.
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
501 W. Broadway, 18th Floor
San Diego, CA 92101-3598
Tel: (619) 338-6500
e-mail: lshen@sheppardmullin.com

[X] BY ELECTRONIC SERVICE: Pursuant to the Parties' agreement to accept service electronically, I caused such document to be electronically served via email to the email addresses of the addressee(s).

Executed on **May 7, 2024** at Los Angeles, California.

[X] Federal I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.


ANGIE O. PAZ